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all regulators domestic and international with respect to the Plan for all nations in the area served by the NANP. Mitretek's electronic databases will provide data relating to all resources in response to requests and may include analysis as required.

Mitretek understands the vital nature of NANPA data. We understand that data made available in response to inquiries is often of a critical nature impacting regulatory actions and carrier business plans. It is Mitretek's way of doing business to protect the confidentiality of inquiries where appropriate and as requested for business planning purposes.

Of course, beyond the active and prompt response to inquiries from whatever quarter, the Mitretek NANPA will make most NANP resource data available electronically on a real time basis. ■

Requirement

4.1.9 The NANPA Will Provide Documentation Via Web, Electronic, or Paper Based in Response to Requests

Mitretek will fully comply with this requirement.

Mitretek takes very seriously its obligations as the NANP Administrator as the purveyor of critical information regarding the NANP. As the sole source for documentation about

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the Plan and the status of its various numbering resources, and a primary source for guidelines and policy regulating the allocation and assignment of the Plan's resources, Mitretek is prepared to make all necessary documentation available electronically or in hard copy.

Because Mitretek intends to make NANPA data available electronically on a real time basis, we anticipate that many requests may be satisfied immediately on the day of the request. A detailed description of Mitretek's new NANPA Web site is provided in Section 9.2 in this document.

The systems that will act as source data for the Web site will be designed for alternative paper or fax delivery of information upon request. Mitretek will provide a telephone number to act as a request point of contact for those choosing telephone rather than Internet, fax, or USPS contact. Similarly, fax requests are also available for those needing information. Mitretek will have an additional telephone number for fax requests. For those wanting to send regular surface mail, the mailing address of the new NANPA will be NANPA, Mail Stop NXX, 7525 Colshire Drive, McLean, Virginia, 22102.

Mitretek has been a leading site on the research and development of search techniques that are just now being deployed in publicly available systems such as the World Wide Web.

Mitretek was one of the first companies in the world to utilize technologies that have

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come to be known as "Intranet" capabilities. Mitretek's Internet Development Facility is a nationally recognized resource as a research center for use of the Internet and Internet technologies in the public interest. ■

Requirement

4.1.10 The New NANPA Will Provide Assistance to Requesters In a Manner

Optimizing Resources

Mitretek will fully comply with this requirement.

Mitretek staff at the new NANPA will be trained to assist requesters of information about numbering resources to optimize assigned resources. Resources will be assigned within guidelines to enhance conservation where possible. Operating within the industry established guidelines, Mitretek understands the critical importance of conducting its work as the NANPA in a manner reflecting the industry's universal ethic of resource conservation.

Should an alternative to a resource request exist and it can be assigned without compromise to the petitioning party, Mitretek will suggest it and demonstrate its use in the course of assisting a user through an assignment request. Techniques leading to full utilization of single resources without the expense of allocation of multiple resources will be employed wherever possible so as to preserve and optimize all NANP resources.

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In addition, Mitretek will guard against unwise resource assignment if possible within the guidelines to prevent a future reclamation requirement. We will monitor the assignments of all resources with special focus given to processes and decisions which may ultimately lead to the need to reclaim the assignment. ■

Requirement

4.1.11 NANPA Numbering Resource Activities Will Be Coordinated With

Canadian and Other NANP Nation Number Administrators

Mitretek will fully comply with this requirement.

It will be an essential administrative function in the Mitretek NANPA to coordinate the assignment and use of resources with the Canadian Number Administrator. Outside of the United States in the area served by the NANP, Canada will most likely be a major consumer of the Plan's resources. As necessary, all NANP nation numbering administrators will be included in Mitretek's coordination of scarce and heavily used resources.

Mitretek will include high level staff in the new NANPA from Canada to further ensure a smooth and open transition and the provision of the most effective service to Canadian carriers and regulators. For example, Mitretek understands the criticality of prompt, effective, and appropriate NPA assignments to Canada to meet its regional and industry

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development requirements. Upon request, Mitretek will provide support to Canadian regulators with matters pertaining to NANP resources and their assignment.

Through our attendance and participation at the Canadian Steering Committee on Numbering and U.S. related fora (e.g., INC) Mitretek will strive to be informed about the needs of the Canadian industry for numbering resources provided by NANPA.

According to Industry Canada, the Canadian Number Administrator (CNA) works cooperatively with the NANPA. The CNA, under the direction of the Canadian Steering Committee on Numbering (CSCN), provides an administrative service to the Canadian telecommunications industry regarding the assignment of certain NANP resources in Canada. These functions include:

- Administer, coordinate, and facilitate the acquisition of certain NANP resources on behalf of the Canadian telecommunications industry in accordance with directions and assignment guidelines approved by the CSCN and/or the INC.
- Validate requests from entities for NANP resources to ensure that the requests satisfy the requirements identified in the appropriate assignment guidelines, regulatory decisions, and Industry Canada numbering policies.
- Ensure consistency in interpretation of assignment guidelines with the NANPA.

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- Provide information on NANP resources to assist Canadian entities in determining which numbering resources to consider for their application. The NANPA may assist entities by providing an explanation of assignment guidelines; however, the NANPA does not provide advice to Canadian entities on numbering issues.
- Seek clarification and guidance from CSCN on numbering resource assignment issues which are not adequately addressed in approved industry assignment guidelines.
- Secure current data from NANPA to assist in the maintenance of an up-to-date National Numbering Index of all Canadian resources assigned by the CNA.

The new CNA, to be appointed by year-end in a process directed by the Canadian Steering Committee on Numbering, will also become the Canadian Central Office Code Administrator and be responsible for NPA Code Relief coordination in Canada. ■

Requirement

4.1.12 The NANPA Will Determine the Allocation of Cost Sharing Between NANP Countries

Mitretek will be fully compliant with this requirement as modified by NANC's response to the related vendor Question.

Mitretek understands that the NANC NANPA Working Group has ascertained that the NANPA will not negotiate or decide the cost allocation for NANPA area served nations.

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The NANPA will provide information and research to support decisions made by regulators and others from all nations served.

This matter is addressed in detail in Section 8.5.1 of the Requirements Document and this reference to cost allocation is subservient to that and the matter's resolution by the NANC, FCC, and other nations' regulators. ■

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4.2 NANP Number Resource Assignment and Administration

This section provides a detailed description of how Mitretek will perform the assignment and administration function for all of the NANP numbering resource types listed in Section 4.2 of the Requirements Document, except "Central Office Codes." The terminology Central Office Codes refers specifically, and only, to the DEF digits associated with geographic NPA codes. The subject of Central Office Codes Administration for geographic NPA's assigned to USA locations is contained in Section 5.0 of this document.

The following NANP resource categories are included in this section:

- Numbering Plan Area (NPA) Codes (4.2.1)
- NPA 809 Central Office Codes (4.2.2)
- International Inbound NPA (456) NXX Codes (4.2.3)
- Personal Communications Services N00 (SAC 500)¹ 1 NXX Codes (4.2.4)
- Service Access Code (SAC)² 1 900 NXX Codes (4.2.5)
- N11 Service Codes (4.2.6)

¹ Mitretek acknowledges that the INC NPA Allocation Plan and Assignment Guidelines (Paras 4.1.3 and 12.1.2) specify that NOO formatted NPA codes, traditionally referred to as Service Access Codes (SACs) are now considered to be Easily Recognizable Codes (ERCs). However, all of the INC's Assignment Guidelines continue to refer to NOO NPA codes as SACs, therefore the traditional nomenclature (i.e., SAC) will be used in this section of the document which deals specifically with INC Assignment Guidelines.

² Ibid.

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- Service Access Code (SAC)³ 1 800 855 XXXX Line Numbers (4.2.7)
- 555 XXXX Line Numbers (4.2.8)
- Carrier Identification Codes (CIC's) (4.2.9)
- Vertical Service Codes (VSC's) (4.2.10)
- ANI II Digits (Automated Number Identification Information Integers) (4.2.11)
- Non-Dialable Toll Points (NPA's 886 & 889) NXX Codes (4.2.12)
- New numbering resources, may be required (4.2.13)

As a general rule, all resources will be assigned and administered (by NANPA) according to the terms and conditions defined in the relevant Industry Guidelines. It is however proposed that although all of the existing Industry Guidelines contain principles (i.e., a principles section), the following guiding principles be adopted by NANPA as the basis for all NANP resource assignment and administration decisions.

Guiding Principles - All Resources

1. NANP resources are collectively managed by the North American telecommunications industry with oversight provided by designated federal regulatory authorities in the countries served by the NANP.

³ Ibid.

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2. NANP resources exist for and should be utilized to serve the needs of the North American telecommunications community for the evolution of services, and the provision of geographic and non-geographic applications.
3. NANP resources will be assigned in a fair, timely, and impartial manner.
4. The North American telecommunications industry has the responsibility to ensure that there is always an adequate supply of NANP resources available to meet the needs of telecommunications service providers and their users.
5. NANP resources are finite and must be used in the most effective and efficient manner possible.
6. NANP resources are public resources. Administrative assignment of the resource does not imply ownership of that resource by NANPA, nor does it imply ownership by the entity to which the resource is assigned.
7. NANP resources will be administered by the NANPA according to the terms and conditions prescribed in the relevant industry approved assignment/allocation guidelines or regulatory directives.
8. Industry developed assignment/allocation guidelines do not supersede principles, procedures, or requirements established by controlling regulatory or governmental authorities within the countries served by the NANP.
9. NANP resource assignment/allocation guidelines are expected to apply throughout the NANP serving area unless NANP area administrations direct otherwise.

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10. Information received by NANPA in support of requests for resource assignments shall be treated on a proprietary and confidential basis, adequately safeguarded and not shared with non-NANPA personnel.
11. NANP resources will be assigned on a first-come first-served basis and every attempt will be made to satisfy an applicants request for a specific resource (i.e., number).
12. While specific conditions defined in relevant industry guidelines will prevail, in general, information regarding the current status (e.g., assigned, unassigned, etc.) of all NANP resources under NANPA's jurisdiction will be available to the public in both electronic and paper form.

The NANP Administration will be responsible for the overall administration of NANP resources which serve the 19 countries in the NANP serving area. The NANC has determined that the administrative/assignment functions to be performed by NANPA shall be as described in Industry Numbering Committee (INC) assignment and allocation guidelines, related industry documentation, and the guidelines/policies of federal regulatory authorities in the countries served by the NANP.

As a general procedure, the NANPA will keep the NANC fully apprised of all instances in which liaison is underway with industry committees (e.g., INC, CSCN, etc.), and, whenever contact is made with a national or state regulatory authority. ■

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4.2.1 NANP Administration Functional Requirements/NANP Number Resource Assignment and Administration/Numbering Plan Area (NPA) Codes

A. Description of Resource

NPA codes are the initial three digits of the string of 10 digits (i.e., NPA NXX XXXX) that make up the NANP.

The NPA resource consists of all of the possible three digit numerical combinations, except the following:

- 000 through 199 - protected to allow the use of 0 and 1 formatted prefixes
- 211 through 911 - set aside as "Service Codes"
- 950 - protected to avoid conflict with another application (i.e., FGB)
- 555 - protected to avoid conflict with another application (i.e., DA)

NPA's are classified as either geographic or non-geographic, and are defined as follows:

- Geographic NPA's are those which correspond to discrete geographic areas.
- Non-geographic NPA's are those which do not correspond to the above referenced discrete geographic areas, but which are allocated to services or applications with attributes, functionalities, or requirements which transcend the boundaries defined by geographic NPA codes.

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Unassigned NPA codes are divided into the following four partitions:

- **Specific Geographic NPA Relief Codes** - These codes are specific, unassigned NPA's which are reserved to provide exhaust relief to designated geographic areas.
- **NANP Expansion Codes** - These are the group of NPA's in the N9X format which have been set aside to facilitate the expansion of the NANP beyond the current 10-digit format.
- **Easily Recognizable Codes (ERCs)** - These are NPA's that due to their unique digit patterns (e.g., N22, N33 N88), have been designated for services or applications which will benefit from conveying to users certain unique knowledge regarding calls to those numbers. NOO formatted NPA codes, referred to as Service Access Codes (SACs), are included in this partition.
- **General Purpose Codes (GPCs)** - All unassigned NPA's which are not included in the previous partitions are GPCs. It is intended that these NPA's will be used for an unforeseen application, or, to supplement the other three partitions as required.

This Section (4.2.1) documents Mitretek's proposal for the management and administration of NANP Numbering Plan Area (NPA) resources. Other types of NANP resources (e.g., CICs), and, resources which subtend assigned NPAs (e.g., SAC 500 NXX codes) are covered in subsequent parts of Section 4.2. Details pertaining to the NANP Administration's role in managing central office codes in the geographic NPAs assigned to the USA are provided in Section 5.0.

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B. Guidelines and Controls

The NANP NPA code resource will be assigned, allocated, and administered according to the terms and conditions defined in the most current version of NPA Allocation Plan and Assignment Guidelines (as of April 3, 1997 - INC 96-0308-011). In addition, any directives issued by a NANP participating country's federal regulatory authority (e.g., FCC 96-333) must also be adhered to.

The following specific assignment and administration functions will be performed by the NANP Administration:

- Ensure that all clients (applicants, industry members, regulatory authorities, etc.) have access to the most up-to-date version of the NPA Allocation Plan and Assignment Guidelines, the application forms, and the assignment records.
- Ensure that the client is familiar with the terms and conditions of the Guidelines, including Purpose, Assumptions, Principles, Criteria, etc.
- Ensure that if the client is an applicant they are willing to adhere to all the terms and conditions of the Guidelines.
- Provide assistance to clients in terms of determining the appropriateness of NPA resources for their proposed service, and, in their understanding and completion of the application process.
- Consult with the CNA on NPA issues involving Canadian applications or impacts.

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- Consult with representatives from the Caribbean region regarding NPA related issues, as appropriate (reference Section 4.2.2).
- Establish a database to record, track, and monitor NPA code assignments.
- Process application forms in accordance with Guidelines Sections 5.1 and 5.2.
- Issue Information Letter(s) (IL's) to notify industry of the assignment of, or change in, the status of any NANP NPA resource.
- Manage the Specific Geographic NPA Relief Codes reservation and assignment process, according to Guidelines Section 9.0.
- Manage the process of assigning NPA codes to "countries," according to Guidelines Section 10.0.
- Manage the ERCs, according to Guidelines Section 12.0.
- Manage the GPCs, according to Section 13.0 of the Guidelines.
- Establish a system to identify NPA codes that have not been put into service by the date specified on the application form.
- Initiate an inquiry into the status of codes that have not been put into service within the required timeframe, and commence reclamation procedures.
- Perform code reclamation procedures as appropriate.
- Request and acquire annually, seven year forecasts of existing code holders future requirements (COCUS).

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- Establish and maintain an up-to-date (i.e., annually based on COCUS results) list of NPA codes which are designated to relieve the exhaust of specific geographic NPA codes.
- Based on actual assignment rates and forecast data, calculate and provide NPA exhaust projections to the industry (e.g., INC).
- Issue annual report on the status of NPA's
- Participate in the development and implementation of NPA exhaust relief plans and the NANP Expansion Plan.
- Conduct periodic audits of non-NANPA NPA Administrator's records (e.g., Canada).
- Abide by industry agreed code conservation practices in order to ensure the most effective use of the resource and therefore maximize its life expectancy.
- Apprise INC (i.e., submit Issue Statement) when the Guidelines require modification.
- Participate in the appeal process in accordance with the terms specified in Section 8.0 of the guidelines.
- Interface with Bellcore TRA to ensure that NPA related information published to the industry via the Local Exchange Routing Guide (LERG), etc., is current and up-to-date.

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C. External Liaison

The following specific circumstances requiring external liaison by NANPA have been identified. It is recognized, that although NANPA has a level of decision making authority, as defined in Industry Guidelines, there may be many circumstances which will require NANPA to seek direction from the industry (e.g., INC), or a national regulatory authority.

NANPA will involve the INC in the event of the following:

- Identification of a requirement to modify INC documentation (i.e., INC 96-0308-011).
- Receipt of an application or a question which is not adequately covered in the Guidelines.
- Routine notification of resource status.
- Immediate identification of a change in exhaust projection information.
- An unresolved dispute, and the resulting use of the specified Appeals Process (Guidelines Section 8.0).
- An unsuccessful attempt to reclaim a resource from a code holder.

NANP Administration will seek direction from the appropriate regulatory authority(s) on issues involving policy or regulatory interpretation.

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NANPA will consult with the numbering authority in each NANP area country (e.g., CNA) whenever an NPA application or issue impacting that country is identified.

NANPA will exchange information with Bellcore Traffic Routing Administration (TRA) regarding the publication of NPA code assignments in the LERG. NANPA will provide NANP NPA related information to the ITU-Telecommunications Standardization Bureau (TSB), so as to ensure the availability of NANP related information required for routing and screening of international inbound traffic.

D. Organization and Staffing

The administration of this resource will be carried out by the NANP Administration 60 days following Mitretek's selection as the new NANP Administration.

E. Systems/Interfaces

The NANP Administration will establish a single centralized NANP Resource Database. All NANP resource records, including NPA resource data, will be stored and managed in this system in a consistent and secure manner. The system will feature state-of-the-art security protection and redundancies. Access to the system, including dial-up, will include establishing a range of user privileges which will be controlled by a sophisticated "pass card" based entry system. The NANP Resource Database will be capable of interfacing directly with the NANP Administration Web site. This will ensure that the Web site contains the most up-to-date and accurate information possible. NANP Administration

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personnel will be provided with a standard NANP Administration workstation to access and manage the NANP resource(s). Administrators will be able to access (read only) all NANP resource data from each workstation. However, manipulation/management of data will be restricted to designated individuals by resource type.

Complete details of the NANP Administration data management system are provided in Section 9.2 of this proposal.

The following information and reporting mechanisms will be established.

- A NANPA Web site will be created and maintained. It will contain the following NPA related information:
 - A listing of all NPA codes, with identification of the application to which the NPA code is assigned/reserved.
 - A breakdown of NPA's assigned by state or region.
 - Locations served by each geographic NPA.
 - A description of the dialing plan in effect in each geographic NPA.
 - The current version of the NPA Allocation Plan and Assignment Guidelines (i.e., INC 96-0308-011).
 - Information relevant to NPA code exhaust or relief activities, including the status of all USA geographic NPA code relief proceedings. This will include a weekly update of

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the details (e.g., NPA and C.O. codes impacted, relief plan(s), key dates, test numbers, etc.) for each NPA undergoing relief activity.

NOTE: All information available from the NANPA Web site will also be available from NANPA in paper form.

- Periodic reports (as defined by industry) of the status of the NPA codes resource will be provided to industry committees (e.g., INC).
- Details of assignments or change in the status of NPA code will be sent directly to the NANPA Mailing List via NANPA Information Letters.
- Annual reports on the status of NPA's, including maps, etc. will be provided.

F. Other Considerations/Impacts

NPA codes are the highest ranking and most powerful component of the 10-digit structure of the NANP (i.e., NPA NXX XXXX). As such, it is imperative that the NANP Administration, acting in concert with the North American telecommunications industry and its regulatory bodies ensure the successful stewardship of these critical resources. It is also recognized that given the nature of this NPA resource, decisions regarding its use often involve commercial or political (or both) overtones which tend to further complicate an already complicated process. NANPA must not only be the central repository of all NANP NPA related information, it must provide that same information, and advice, to all

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its clients in a timely, evenhanded, and constructive manner. Mitretek is acutely aware of the critical nature of NPA related number administration/management and has factored this into the resource estimates for performing this task. ■

4.2.2 NPA 809 Central Office Codes

A. Description of Resource

NANP NPA 809 was initially assigned to serve the needs of the participating nations and the U.S. territories in the Caribbean region, including Bermuda. The central office codes were shared amongst all participating entities and were administered by the current NANPA. With the introduction of interchangeable NPA codes in 1995, most of the countries involved in the original NPA 809 have determined to obtain their own unique NANP NPA codes.

The implementation of these new NPA's is currently underway. As each country/territory establishes its own NPA, it assumes responsibility for the administration of the central office codes within its NPA.

Ultimately, the Dominican Republic will become the sole user of NPA 809, and will assume responsibility for the administration of its central office codes.

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B. Guidelines and Controls

There is a need to continue to administer NPA 809 central office codes until such time as the Dominican Republic is prepared to assume that responsibility. As the balance of the countries/territories in the Caribbean region finalize the implementation of their new NANP NPA codes, the central office codes originally assigned to those countries from NPA 809 will become available to the 809 administrator for reassignment. Additionally, new central office code assignments to the Dominican Republic may be required during this time interval. NANPA must maintain the integrity of the NPA 809 central office code assignment database, and work with the Caribbean nations/territories until a turnover of the NPA 809 administration responsibility to the Dominican Republic is completed.

C. External Liaison

The process of administering NPA 809 central office codes has been very much a one-to-one exchange of information between NANPA (the administrator) and each of the sovereign countries/territories involved. It is anticipated that this type of administration will continue until only a single country remains in NPA 809 and the administration responsibility is turned over to them (i.e., the Dominican Republic). NANPA will continue to keep North American industry apprised of NPA related developments in the Caribbean through periodic reports to the industry (e.g., INC) and most importantly through the NANPA Web site, where details of NPA assignments will be maintained.

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D. Organization and Staffing

The administration of this resource will be carried out by the NANP Administrator 30 days following Mitretek's selection as the new NANP Administration.

E. Systems/Interfaces

The NANP Administration will establish a single centralized NANP Resource Database. All NANP resource records, including 809 resource data, will be stored and managed in this system in a consistent and secure manner. The system will feature state-of-the-art security protection and redundancies. Access to the system, including dial-up, will include establishing a range of user privileges which will be controlled by a sophisticated "pass card" based entry system. The NANP Resource Database will be capable of interfacing directly with the NANPA Web site. This will ensure that the Web site contains the most up-to-date and accurate information possible. NANP Administration personnel will be provided with a standard NANP Administration workstation to access and manage the NANP resource(s). Administrators will be able to access (read only) all NANP resource data from each workstation. However, manipulation/management of data will be restricted to designated individuals by resource type. Complete details on the NANP Administration data management system are provided in Section 9.2 of this proposal.

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F. Other Considerations/Impacts

If NANPA's involvement in the administration of NPA 809 becomes either prolonged or involves more than a simple turnover, the activity should be considered as an Enterprise Service in the future. ■

4.2.3 International Inbound NPA (456) NXX Codes

A. Description of Resource

NPA 456 and its associated NXX codes are assigned to enable the routing of inbound international traffic to specific North American international carriers. The 456 NXX codes are uniquely assigned to international carriers to enable carrier identification to take place in originating international networks through the analysis of the NANP numbers. The use of the NPA 456 NXX resources is restricted to traffic inbound to the international carriers home country either from outside the NANP area (i.e., international inbound) or from another NANP country (i.e., inter NANP country). Use of these resources within the domicile country of the code holder/carrier (i.e., intra NANP country) is currently prohibited. The NANP Administration will assign and administer the NXX codes in NPA 456 under industry developed Assignment Guidelines. The code holder/carrier is responsible for the assignment/administration of the line numbers within their assigned NPA 456 NXX codes.

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B. Guidelines and Controls

The NPA 456 NXX codes will be assigned and administered according to the terms and conditions defined in the most current version of the International Inbound NPA (INT/NPA/NXX) Assignment Guidelines (as at 3 April 1997 - INC 94-0826-003). The following specific assignment and administration functions will be performed by the NANP Administration:

- Ensure that all clients (applicants, code holders, industry members, regulatory authorities, etc.) have access to the most up-to-date version of the International Inbound NPA (INT/NPA/NXX) Assignment Guidelines, the application forms, and the assignment records.
- Ensure that the client is familiar with the terms and conditions of the Guidelines, including Purpose, Assumptions, Principles, Criteria, and Responsibilities of Code Holders and Applicants.
- Ensure that if the client is an applicant or a code holder, they are willing to adhere to all the terms and conditions of the Guidelines.
- Provide assistance to clients in terms of determining the appropriateness of NPA 456 NXX resources for their proposed service, and their understanding and completion of the application process.
- Consult with the CNA on NPA 456 NXX issues involving Canadian applications or impacts.